

Message

From: [Nonresponsive based on revised scope]@tetrattech.com]
Sent: 10/9/2020 2:53:04 PM
To: Wagner, Christine [Wagner.Christine@epa.gov]
Subject: RE: FSP Shiloh Church site

They are in the SSQAPP, which is Appendix C – specifically, they are on pdf page 26

From: Wagner, Christine <Wagner.Christine@epa.gov>
Sent: Friday, October 9, 2020 10:32 AM
To: [Nonresponsive based on revised scope]@tetrattech.com>
Subject: Fwd: FSP Shiloh Church site

[Nonresponsive based on revised scope]

Can you answer the question re DQOs? Please respond only to me, not Elizabeth

Thank you
Chris

Begin forwarded message:

From: "Gaige, Elizabeth" <Gaige.Elizabeth@epa.gov>
Date: October 9, 2020 at 10:15:45 AM EDT
To: "Wagner, Christine" <Wagner.Christine@epa.gov>
Cc: "Long, Kia" <Long.Kia@epa.gov>, "Ghimire, Aneesh" <ghimire.aneesh@epa.gov>
Subject: FSP Shiloh Church site

Hi Chris – I see the FSP you sent, with the site specific QAPP and Action Memo as appendices. What I don't see is the Data Quality Objectives. Can you tell me where those are in the document you sent?

Aneesh and Kia are out of office today, but one of the things that we discussed is that Melissa Linden or Laura Mohollen could help you address our comments if you are unsure what we are asking. They have both been working closely with our branch on Quality Assurance since our recent Quality Management Plan has been signed and implemented. Since they are more familiar with Superfund programs, they might be able to give you more guidance than we have given you.

When you are ready for the QA staff to review your document, please submit it to the R3 QA email address with a new review request form – we need to track all document review requests in our database. I'm just giving you a heads up now that if I don't see the Data Quality Objectives, I will write a new review memo with that comment.

I hope this is helpful. Elizabeth

Elizabeth Gaige
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From: Wagner, Christine <Wagner.Christine@epa.gov>
Sent: Friday, October 09, 2020 9:47 AM
To: Gaige, Elizabeth <Gaige.Elizabeth@epa.gov>
Cc: Long, Kia <Long.Kia@epa.gov>; Ghimire, Aneesh <ghimire.aneesh@epa.gov>
Subject: RE: action limit thresholds

Hi Elizabeth,

Thank you for your patience while I work through my first attempt. Per our correspondence, EPA will be using the approved action memo to determine when additional actions are needed. This version addresses the previous comments by the QA group and also includes the Action Memo in the attachments.

This is ready for next level of review. Please advise if you need more information

Thank you
Chris

From: Gaige, Elizabeth <Gaige.Elizabeth@epa.gov>
Sent: Thursday, October 08, 2020 10:24 AM
To: Wagner, Christine <Wagner.Christine@epa.gov>
Cc: Long, Kia <Long.Kia@epa.gov>; Ghimire, Aneesh <ghimire.aneesh@epa.gov>
Subject: RE: action limit thresholds

Hi again Chris – It might be most simple to make the decision document you mention in your email an appendix to the FSP or QAPP. I appreciate you saying that the data will be used according to the DQOs, but my comment on the QAPP was that there are not site specific DQOs in there and you reference the programmatic QAPrP, which says DQOs should be in site specific documents.

Can you send us the decision document – it might address these comments?

Thanks, Elizabeth

From: Wagner, Christine <Wagner.Christine@epa.gov>
Sent: Thursday, October 08, 2020 8:46 AM
To: Gaige, Elizabeth <Gaige.Elizabeth@epa.gov>
Subject: Re: action limit thresholds

Good Morning, Elizabeth

Thank you for the clarification. For Superfund removal projects, a data value alone is not the basis for an action decision.

The data results are certainly important, but not the only factor. Action levels, if applicable, are identified in a decision document rather than in a field sampling plan and/or QAPP

In this particular case, the data will be used according to the DQOs, which are to determine if hazardous substances are present.

I am requesting FSP/SSQAPP be approved with memo to file if needed

Thank you for researching my question

Chris

*Christine Wagner
Federal On-Scene Coordinator
EPA Region III
804-337-3049*

On Oct 7, 2020, at 3:09 PM, Gaige, Elizabeth <Gaige.Elizabeth@epa.gov> wrote:

Chris – I got in touch with Aneesh, who confirms that the thresholds I’m asking about in my comments are Action Limits, which could be MCLs, RLs, State ARARs, etc.

If you want to discuss this with us, I think it would have to wait until tomorrow. We both have a meeting at 3:30 this afternoon.

Hopefully this clarification is straightforward and will not further slow down a revision to the document. Please let me know.

Thanks, Elizabeth

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From: Ghimire, Aneesh <ghimire.aneesh@epa.gov>
Sent: Wednesday, October 07, 2020 2:58 PM
To: Gaige, Elizabeth <Gaige.Elizabeth@epa.gov>
Subject: RE: can you help me with superfund terminology?

I think you were trying to ask them to show the action limits for soil and water. I found this definition in UFP QAPP for action limit.

Action limit/level — The numerical value that causes a decision maker to choose or accept one of the alternative actions. It may be a regulatory threshold standard, such as a maximum contaminant level for drinking water; a risk-based concentration level; a technology limitation; or a reference based standard.

So, threshold should come from somewhere and you are right to ask them where is the action limit and what is it coming from (regulatory threshold). Example of regulatory threshold could be MCLs, RLs, State ARARs, etc.

Hope this helps otherwise we can bring it up in the meeting.

Aneesh Ghimire

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From: Gaige, Elizabeth <Gaige.Elizabeth@epa.gov>
Sent: Wednesday, October 07, 2020 2:44 PM
To: Ghimire, Aneesh <ghimire.aneesh@epa.gov>
Subject: can you help me with superfund terminology?

Hi Aneesh – I sent comments on a superfund FSP asking what thresholds data will be compared to. This isn't a comment I've made on other superfund document, but this FSP said that action would be triggered at an air standard, but it didn't mention what would happen with soils data or water data. I make this comment all the time when I review water and air QAPPs.

When I sent the comment, the person I sent it to didn't understand what I meant by a threshold. If this were a QAPP from the CWA world, I'd ask for the water quality standard. If it were a CAA QAPP, data would be compared to the NAAQS.

Can you help me out – did I ask for something that doesn't exist? Am I asking for the action limit?

If its easier to talk about this, I can hijack another 5 minutes of the QA meeting or you can give me a call at 215-814-5676. Or if I'm off base and this is not something needed in the QAPP, you can just let me know that.

Thanks in advance! Elizabeth

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